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*Counsel for Defendants Inspira Health Network, Inc.  
and Inspira Medical Centers, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND  
COMPOUNDING PHARMACY, INC.  
PRODUCTS LIABILITY LITIGATION**

**Document Electronically Filed**

MDL No. 1:13-md-2419-FDS

**THIS DOCUMENT RELATES TO:**

*Hannah v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10407;  
*Jones v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10409;  
*Ramos v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10410;  
*Rios v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10411;  
*Rivera v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10412;  
*Tayvinsky v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10414;  
*Gould v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10444; and  
*Normand v. New England Compounding Pharmacy,  
Inc. et al.*, Docket No. 13-cv-10447

**DECLARATION OF MICHAEL B. HAYES**

I, Michael B. Hayes, hereby submit this Declaration to the Court pursuant to Local Rule 83.5.3, in support of the Motion to Admit me *Pro Hac Vice* and as part of my application for leave to practice in this Court and to appear as co-counsel on behalf of Defendants Inspira Health Network, Inc. and Inspira Medical Centers, Inc. (formerly known as South Jersey Health System, Inc. and South Jersey Hospital, Inc.) (collectively, “Inspira”), and state:

1. I am a member in good standing of the Bars of the State of New Jersey, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania, the United States District Courts for the Eastern and Middle District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

2. I am a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP; my office is located at 123 South Broad St., Philadelphia, Pennsylvania 19109; my direct telephone number is 215-772-7211.

3. I have never been subject to any disciplinary action, and no disciplinary actions are pending against me as a member of any bar to which I am admitted.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 19, 2013

/s/Michael B. Hayes  
Michael B. Hayes